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March 4, 2025

Wylie Stecklow, Esq.
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152 West 57th Street - 8th Floor
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Re: *Cypress Holdings, III, L.P. v. Hall*, No. 1:22-cv-1243 (LGS)
Sport-BLX v. Salerno, et al, 22-cv-08111 (LGS)

Dear Mr. Stecklow:

I am writing in response to your letter dated February 4, 2025 and subsequent correspondence regarding your allegations of violations of Federal Rules of Civil Procedure R. 11 on behalf of my office and my client in the above referenced matters. After a thorough review of your specific allegations of false representations made in our motion papers, we are willing to correct the following statement in our brief that includes "the diversion of the \$3,983,000 success fee to Hall's Clinton Group." The amount of the diverted success fee should be \$2,634,615.

We view the remainder of your allegations to be without merit. Our responses to your Statement of Undisputed Facts as well as the statements in our motion papers were adequately supported by the record. Further, we strongly deny and object to your allegations that we made any statements to the Court that were knowingly false.

Thank you.

Very truly yours,

Alexander Dudelson

Alexander M. Dudelson